

REED SMITH LLP  
A limited liability partnership formed in the State of Delaware

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Attorneys for Lincoln Electric Holdings; The  
ESAB Group, Inc (erroneously named as  
"ESAB Group, Inc., as itself and successor to  
Alloy Rods Inc. and L-TEC Welding and  
Cutting Systems, Inc."); The Lincoln Electric  
Company; A.O. Smith Corporation; Praxair, Inc.  
(erroneously named as "Praxair, Inc., as  
successor to Linde Air Products"); Union  
Carbide Corporation (erroneously named as  
"Union Carbide Corporation, as successor to  
Linde Air Products and Haynes Satellite  
Works"); Viacom Inc., successor by merger to  
CBS Corporation, f/k/a Westinghouse; Hobart  
Brothers Company (erroneously named as  
"Hobart Brothers Company, as itself and  
successor to Teledyne McKay, Inc." and  
"McKay Welding Products"); The BOC Group,  
Inc. f/k/a Airco, Inc. (erroneously named as  
"AIRCO/The BOC Group, Inc., as itself and as  
successor to Airco, Inc. (f/k/a Air reduction Co.)  
and Wilson Welder & Metal Co."); Allegheny  
Technologies, Inc.; Lincoln Global, Inc.;  
Sandvik, Inc. (erroneously named as "Sandvik  
Materials Technology Company"); and Airgas  
Gulf-States, Inc.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

DAVID DICKENS, an individual and PATRICIA  
DICKENS, an individual,

Plaintiffs,

vs.

A.O. SMITH CORPORATION; ADAMS  
HARD-FACING COMPANY, INC.; AIR  
PRODUCTS & CHEMICALS, INC.; AIRCO  
INC.; AIRCO/THE BOC GROUP, INC., as itself

No.: C06-04810 WHA

**STIPULATION AND [PROPOSED]  
ORDER STAYING PROCEEDINGS**

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and as successor to Airco, Inc. (f/k/a Air Reduction Co.) and Wilson Welder & Metal Co.; AIRGAS-GULF STATES, INC.; ALLEGHENY TECHNOLOGIES, INC. as successor to Teledyne-McKay Welding Products; AVESTA POLARIT, INC.; BOC FINANCIAL CORP.; THE BOC GROUP, INC.; CATERPILLAR, INC.; THE ESAB GROUP, INC.; ESAB GROUP, INC., as itself and as successor to Alloy Rods Inc., and L-TEC Welding and Cutting Systems, Inc.; GENERAL ELECTRIC COMPANY; HAYNES INTERNATIONAL, INC.; HOBART BROTHERS COMPANY, as itself and as successor to Teledyne McKay, Inc.; ILLINOIS TOOL WORKS, INC., as successor to Hobart Brothers Corp., Teledyne McKay, Inc. and Miller Electric Manufacturing Corp.; THE LINCOLN ELECTRIC COMPANY LINCOLN ELECTRIC HOLDINGS; LINCOLN GLOBAL, INC., also known as Seal Seat Corporation; MCKAY WELDING PRODUCTS; METROPOLITAN LIFE INSURANCE COMPANY; MILLER ELECTRIC MANUFACTURING CO., INC ; PRAXAIR, INC., as successor to Linde Air Products; RANKIN INDUSTRIES, INC.; STOODY COMPANY, as itself and as successor to the Deloro Stellite Company; THERMADYNE HOLDINGS CORPORATION, as itself and as successor to the Deloro Stellite Company, Stooddy Company, and Tweco Products, Inc.; UNION CARBIDE CORPORATION, as successor to Linde Air Products and Haynes Stellite Works; VIACOM, INC.; WESTINGHOUSE ELECTRIC CORPORATION; J.W. HARRIS COMPANY, INC.; OLSON AND CO. STEEL, individually and as successor-in-interest to BOSTROM-BERGEN METAL PRODUCTS; BOSTROM-BERGEN METAL PRODUCTS; VICTOR EQUIPMENT COMPANY; HUNTINGTON ALLOYS CORPORATION f/k/a Inco Alloys International Inc.; SANDVIK MATERIALS TECHNOLOGY COMPANY; THERMADYNE INDUSTRIES aka Stooddy; EAST BAY WELDING SUPPLY, INC.; CALIFORNIA WELDING SUPPLY COMPANY; GENUINE PARTS COMPANY; and Does 1-1000,

Defendants.

1 IT IS HEREBY STIPULATED by and between the parties hereto through their respective  
2 attorneys of record that all proceedings in this matter be stayed pending a transfer of this action to  
3 In re Welding Fume Products Liability Litigation, MDL No. 1535 (N.D. Ohio).

4  
5 Throughout the period during which the transfer is pending, the parties stipulate to a stay of  
6 Defendants' obligation to respond to the complaint and of the parties' right to propound discovery.  
7 During this period, the parties respectfully request that this Court refrain from issuing any  
8 scheduling orders in this matter, including but not limited to case management orders and orders  
9 pertaining to Alternative Dispute Resolution. Furthermore, any and all case management  
10 conferences currently on calendar are now removed.

11  
12 SO STIPULATED AND AGREED

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By

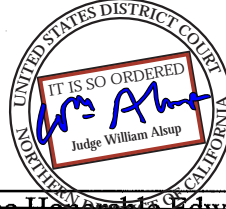
DATED: 8/23/06

By

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**PURSUANT TO STIPULATION, IT IS SO ORDERED**

DATED: October 3, 2006



By \_\_\_\_\_

~~The Honorable Edward M. Chen~~  
William Alsup  
United States District Judge

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